

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of Telecommunications and)	
Energy on its own motion pursuant to G.L. c. 159, §§ 12 and 16,)	
into the regulations, practices, equipment, appliances, and)	D.T.E. 02-15
service of Network Plus, Inc.)	
)	

PETITION TO INTERVENE OF RNK, INC. D/B/A RNK TELECOM

Pursuant to 220 C.M.R. 1.03 of the Department's Procedural Rules, RNK, Inc. d/b/a RNK Telecom ("RNK Telecom") petitions to intervene as a participant in the above-captioned proceeding. In support of this petition, RNK Telecom states as follows:

1. RNK Telecom is a competitive local exchange carrier ("CLEC") with its principal place of business at 333 Elm Street, Dedham, Massachusetts 02026. RNK Telecom is a facilities-based and resale CLEC focused on delivering a full array of voice and data services to both residential and business customers in Massachusetts.
2. The Department has opened this docket on its own motion to, among other things determine whether the regulations, practices, equipment, appliances, and service of Network Plus are unjust, unreasonable, unsafe, improper, or inadequate. As such, under G.L. c. 159 Sections 12 and 16, the Department may create policy that will have a substantial and specific effect upon RNK Telecom.
3. RNK Telecom provides some similar services and includes among its customers, some of those similar to those served by Network Plus. As a result, several of Network Plus' existing or former customers have approached RNK Telecom seeking service. Since this proceeding will look into issues relating to current and former Network Plus customers, RNK Telecom will be specifically affected.
4. RNK Telecom further wishes to be heard on any possible further discontinuation of service notice requirements that may be at issue.
5. RNK Telecom intends to participate as a full participant and take part in issues that may substantially and specifically affect RNK Telecom.
6. After hearing of Network Plus' imminent bankruptcy, RNK Telecom contacted the Department to offer any help it could offer in stabilizing customers and the situation in general, and is concerned about the image of CLECs in light of the recent bankruptcies and misunderstandings.

7. RNK Telecom's interest in this matter cannot be adequately addressed or represented by any other party.

WHEREFORE, RNK Telecom, by and through its attorneys, respectfully requests that this Petition to Intervene be granted and that RNK Telecom be accorded full participant intervention status in this proceeding.

Respectfully Submitted,

RNK, Inc d/b/a RNK Telecom

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